

H

**Brett Schoel**

---

**From:** Brett Schoel  
**Sent:** Monday, April 10, 2017 7:14 PM  
**To:** 'fladseth@aol.com'  
**Cc:** Lynetta Goodwin (lgoodwin@ljdfa.com)  
**Subject:** Gutierrez

Doug,

It was my understanding we vacated your client's deposition because you decided to bring additional parties into the case and you did not want to have your client deposed twice. I understood your concern and agreed even though it took several months to get it scheduled. Today, I received several deposition notices for my clients' depositions. Like you, I do not want my clients being hassled to testify twice so I will send out formal objections. In the meantime, if you truly are bringing in additional parties, I suggest we postpone further discovery (other than producing the peer review documents when I get them together) until all parties are in the case. We would probably go back to the Court and seek a continuance once you have amended your complaint.

For now, can we agree that we will hold off on discovery until everyone is in?

Brett Schoel  
La Follette, Johnson, DeHaas, Fesler & Ames  
655 University Avenue, Suite 119  
Sacramento, CA 95825  
Phone: (916) 563-3100  
Fax: (916) 565-3704  
Email: [bschoel@ljdfa.com](mailto:bschoel@ljdfa.com)